

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
THE PROPERTY AND CASUALTY	)	
INITIATIVE, LLC,	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 05-10520-RCL
	)	
UNITED STATES OF AMERICA	)	
acting through the NATIONAL	)	
CREDIT UNION ADMINISTRATION,	)	
Defendant	)	
_____	)	

**ASSENTED-TO MOTION TO EXTEND TIME IN WHICH TO RESPOND  
TO COMPLAINT**

Now comes the defendant, the United States of America acting through the National Credit Union Administration ("Defendant"), hereby moves this Court for an extension of time **up to and including July 15, 2005**, to answer or otherwise respond to the Complaint. As reasons therefore, the undersigned counsel for Defendant asserts that such an extension will allow counsel the necessary time to obtain relevant facts and background information of this matter. Moreover, the parties are currently engaged in settlement discussions which may resolve this matter.

Defendant asserts that Plaintiff's counsel has assented to this motion. Defendant further asserts that there has been one prior request for extension in this action.

WHEREFORE, Defendant respectfully requests that this Court allows its motion for an extension of time **up to and including July 15, 2005**, to answer or otherwise respond to the Complaint.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ Gina Y. Walcott-Torres  
Gina Y. Walcott-Torres  
Assistant U.S. Attorney  
1 Courthouse Way  
Suite 9200  
Boston, MA 02210  
(617) 748-3369

Dated: June 23, 2005

**CERTIFICATE OF SERVICE**

This is to certify that I have this 23<sup>rd</sup> day of June, 2005, served upon the person listed below a copy of the foregoing document by depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery:

Richard E. Gentilli, Bartlett Hackett Feinberg, P.C., 10 High Street, Boston, MA 02210

/s/ Gina Y. Walcott-Torres  
Gina Y. Walcott-Torres  
ASSISTANT UNITED STATES ATTORNEY

**LOCAL RULE 7.1(A)(2) CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), the undersigned counsel certifies that Plaintiff's counsel has been contacted, and has been informed of the relief requested by this motion.

/s/ Gina Y. Walcott-Torres  
Gina Y. Walcott-Torres  
ASSISTANT UNITED STATES ATTORNEY